

7 August 2022

Dear Mr Kerslake

We welcome the decision to establish the independent review of the strategic delivery of affordable homes in Lambeth and offer some views for your consideration.

Norwood Forum (www.norwoodforum.org) is the community forum for the south east corner of the borough, and a member of the Lambeth Forum Network (this is a borough-wide network seed funded by Lambeth to help to shape local development and services. The Forums work locally to increase the voice of local groups and residents in local decision making). We are a volunteer-led organisation covering West Norwood, Gipsy Hill and Tulse Hill, and our aim is to celebrate our wonderful neighbourhood and its vibrant, diverse, but cohesive community whilst making a positive difference to the quality of life for people who live and work here. To connect our local community we maintain a regular newsletter, website and various social platforms to keep the community up to date on plans and consultations affecting our area as well as events being held locally. We organise a free cultural annual programme and many other events. We also have a campaigning role and are key partners in the community campaign to stop Southwark Metals building a large scrap metal facility in our neighbourhood and the campaign against Lambeth Council's plans to include two local sites in a SADPD.

Indeed we are expressing our views very much in the light of recent experiences over the Council's plans (December 2021) to develop an SADPD covering 14 sites across Lambeth, including sites 18 & 19 in West Norwood town centre. If you need further advice on this plan or indeed anything else, please do get in contact.

Informing, consulting and involving the public

In taking the 2021 SADPD decisions, the 2018-2022 Council administration showed an unwillingness to produce development proposals in co-operation with local residents. This has had the effect of delaying the provision of much needed new housing provision in West Norwood and Tulse Hill and has created local opposition. We are pleased that the new administration (2022-2026) is showing a willingness to reject this approach and work with local people. We assume that your Inquiry is very much part of this new way of working and we strongly advocate for protocols to be written into the Council's procedures so that the Council cannot pick and choose whether to properly engage with local communities or not.

It was startling to learn early in 2022 that Lambeth Council was to enable the comprehensive redevelopment of a large part of our town centre (site 18: including an 11 storey and other tower blocks on a lengthy section of the town centre and land and buildings behind; and site 19: a 22 storey tower block with other blocks on local railway and industrial land). The only consultation put in place was post-decision; this was twofold. Firstly, the proposals were published on the council consultation website for comment (10 January to 22 February 2022).

Secondly, a meeting with key stakeholder groups was held on the earliest offered date (24 January 2022) to "help local representatives consider the material prior to them engaging with their wider membership to formulate consultation responses." But this was already a third of the way through the six week consultation period. No other engagement was undertaken or support for the stakeholder group to engage with the community themselves.

This was doubly concerning in respect of both sites because there was already in place a master plan for the area: [West Norwood and Tulse Hill: A Manual for Delivery \(April 2017\)](#) which was developed with local residents. It appears the Council has ditched the product of hundreds of hours of voluntary work by the community and work by the Council. Ironically, that Plan states:

It is vital that principles of collective action, collaboration and partnership are at the heart of efforts to work towards agreed objectives and aspirations for the area. The strength and willingness to engage of the West Norwood and Tulse Hill community has been instrumental in delivering numerous successes for the area in recent years. The area is also home to a high number of organisations which have the capacity and expertise to take a lead in aspects of delivery, and which have also stated their desire and commitment to being part of future delivery.

There was no opportunity to be alerted to the proposed decision by Cabinet as the Forward Plan entry of this key decision was opaque in the extreme:

On 24.11.20 the following entry appeared for the first time in the Council's Forward Plan:

Title: Regulation 18 draft Site Allocations Development Plan Document
Issue Details: To agree to commence consultation on the Regulation 18 draft of the Site Allocations DPD which will eventually, on adoption, form part of the statutory Development Plan for the borough.
Decision type: key
Reason: 3. Community impact
Wards affected: All Wards

Cabinet took its decisions more than a year later on 13 December 2021. There was no clue in the description that 14 sites across the borough were involved, or in particular that these included two sites in West Norwood and Tulse Hill. All wards were not affected (there were 21 wards at the time, now 25); the particular wards affected were not described and interested parties not alerted.

The Council has in place a comprehensive consultation tool kit ([Statement of Community Involvement October 2020](#)) but it seems Cabinet could just ignore these best practice requirements and jump from secret officer drafting to formal consultation without any public engagement.

People were simply "informed" by Lambeth publishing detailed plans on their consultations web page for six weeks, with reliance on targeted emails by the Council and on community groups to do the leg work to alert the local community. There was no attempt to engage with groups who do not traditionally engage in planning or are digitally excluded. Tried and tested ways of engaging people were not used. Even those directly affected (those set to lose their business or home) were not advised personally by letter. No justification was provided. Nothing was put in plain English. The Council has resources in place to do all this groundwork, e.g. its Corporate Communications department, but chose not to do so.

There was no attempt to develop proposals with interested residents and businesses of West Norwood and Tulse Hill. There was no attempt to learn about local issues and aspirations so these could be incorporated. The proposed developments were treated as being almost completely constrained by the site boundaries. We would contrast this with the StreetWorks project (referenced frequently in the 2017 Manual for Delivery). StreetWorks was a unique community-led project to improve the Norwood Road streetscape and remove the Tulse Hill gyratory through a partnership with the Council and TfL (2015-2019). Funding was provided

and we were empowered to run community workshops to develop proposals – which involved making tough choices to reach a consensus. The SADPD process was a seriously retrograde step in comparison. We are unaware of any other local authorities developing a SADPD which includes so many sites across the borough without initial public engagement.

Incidentally, the Council is currently consulting on a [playground at Norwood Park](#). This consultation is for six weeks (completely acceptable for a project of this scale). The enormous impact of the SADPD proposals were subject to the same consultation timescale.

Furthermore, all the facts were not included in the SADPD consultation exercise. For example on site 19 the established close working relationship between the Council, GLA and a developer was not published. A few days after the closing date (22 February 2022) we learnt that the GLA was to pay an infrastructure grant of £20.5m to the proposed developer of site 19 – which we now know to be EcoWorld: [DD2574 Land at Knollys Road, Tulse Hill](#); decision taken 1 March 2022.

The SADPD has therefore become something to be done to local communities rather than with local communities. We are pleased the new Cabinet Member wanted to meet with us and other key stakeholder groups and listen to our concerns. This meeting took place on 27 July and the new Cabinet Member (Deputy Leader (Councillor Danny Adilypour)) explained he was in 'listening mode' and that he was in 'no rush' and there was 'no timetable' in moving forward on the two SADPS sites in our area, and that he was currently being briefed by the Lambeth planning team. We expect to be working with the new administration on further public engagement in the autumn.

We recognise the need for more affordable housing but this must be provided with the involvement of the community. The SADPD process has effectively wasted eight months already because there is no consensus and local people are suspicious of the plans. The expected further engagement is welcomed and we hope that through proper engagement with the West Norwood and Tulse Hill community, their support for the provision of social/affordable and other housing is achievable.

More than five months on from the closure of the short consultation window we have not received any response (other than an acknowledgement) to our detailed points (you can read our representations and those from other community groups [here on our website](#)). We believe everyone who contributed their views should receive a considered response from the Council and especially organisations like ourselves working on behalf of the community. We had to spend tens of hours working against the proposals, rather than being enabled to work constructively on a way forward.

The SADPD process at Lambeth

The above assessment shows that if the Council still wants to proceed with its SADPD, sites 18 & 19 should be withdrawn and treated separately for two main reasons: firstly the existing Master Plan was completely ignored, and secondly the unique and major impact sites 18 & 19 would have on our town centre. The number of objections on sites 18 & 19 exceed all those on the other 12 sites put together. We wrote to the Leader suggesting she make a statement to this end and then ask Cabinet (April 2022 – the last cabinet meeting of the 2018-22 Council) to make a formal decision. The Leader declined.

The point of reference of the above for your review, is to urge the Council to engage in early identification of those likely to be interested in a proposed housing development, and involve them throughout the development of those proposals in a clear and transparent manner. Publication of firm proposals and the subsequent planning application should therefore have a much easier passage to approval.

The strategic regeneration process at Southwark

We are aware that Southwark Council's Overview & Scrutiny Committee has undertaken a scrutiny review of the regeneration process in that borough. Much of the concerns expressed by amenity groups and set out in the report chime with our own experiences. Southwark Council Cabinet ([14 June 2022 – see item 12](#)) asked for a Cabinet Member and officer response to the scrutiny recommendations within eight weeks. We trust you will consider this response.

Adopting similar processes in Lambeth to those spelt out in the following summarised recommendations would we believe lead to the necessary stepped change in the conduct of redevelopment plans in our borough and to the much sought after early provision of affordable housing:

- A review of consultation procedures for major regeneration projects. In future there would be an audit of the current situation and needs of the locality, using a Community Consultation Framework similar to the Lambeth {but virtually completely ignored for the Lambeth SADPD as already described}, and creating on-going consultative forums through the life of a regeneration project.
- The continued development of town centre based regeneration plans for the main town centres, and their regularly review and recalibration.
- Transparency and clarity around the objectives of the project; establishing the potential to realise residents and businesses aspirations for the locality and the Council's own preferred outcomes. This would enable the promotion of the benefits of regeneration to a community with the aim of evolving more integrated and sustainable communities in terms of good quality housing etc.

Social and/or affordable housing?

When at our one hour briefing meeting with Lambeth officers (24 January 2022) we raised what was meant by affordable/social housing we were referred to the technical definitions and requirements in the London Plan and Local Plan. Information on what is meant by social housing and what is meant by affordable housing needs to be provided in a publicly accessible manner. People need to understand specifically what housing will be provided and whether this is by the Council, housing association, or private developer, as well as the unit sizes of flats and houses, and at what price, as well as other public realm improvements and other provision such as a GP surgery.

We know that new developments frequently do not deliver policy compliant affordable housing and they use the viability tested route to approval rather than the fast track route. It seems to us amazing that so many developers claim their scheme has such poor viability such that reasonable levels of affordable housing, let alone policy compliant ones, cannot be delivered, yet decide to continue with development and then make substantial profits. How can the Council ensure more rigorous testing of viability? Should grants such as that agreed for Site 19 instead be loans repayable to enable recycling back to into development elsewhere or later phases to deliver more homes especially affordable ones? How can Lambeth ensure developers deliver on what is ultimately agreed quantities, tenure and sizes of affordable housing in later phases? How can the Council ensure social housing at Council rent levels of sizes and types actually needed by local people instead of small flats let at much higher affordable rents or even worse products. Will Lambeth commit to at least policy compliant affordable housing of the type, tenure and size .local people need on their own land – given for example they own a significant amount at Site 18? Also, how can the Council ensure the **local** letting or sale of new housing to address local housing need - i.e. avoid developments being sold off plan to often overseas investors as an investment. How can Lambeth best proceed in partnership with a developer to achieve this aim?

Furthermore how can the Council work better with developers to provide housing of a suitable type for those in most housing need? One such category is single parent families. Tall tower blocks are completely unsuitable. Often such single-parent families are in temporary accommodation or overcrowded in existing council properties. It is very common for such families to have additional needs, such as a child with autism or parent with depression. They are caught in a vicious circular of poor health leading to low income leading to worse health compounded by poor housing. It is also a bad idea to move such families into tower blocks where there are no safe communal outdoor spaces close to people's flats and where play space can only be safely used by the whole family going out together so that children are supervised. The reality is the blocks planned for sites 18 & 19 are suitable only for young, well-heeled couples or individuals who buy their properties and pay their service charge that enables the building to be well looked after; they are not so suitable for low-income families.

Housing standards

We want to achieve eco quality buildings (BREEAM or Passive House standards) and also buildings with high architectural merit and a variety of styles and unit sizes. We consider this to be an absolute prerequisite for engagement with developers and other partners and are certain the Council will want to address this failing as part of its response to the climate emergency.

The planning process at Lambeth

The applications system seems to greatly favour the developer. Our understanding is a developer is able to call on detailed planning advice from the Council's officers. At pre-application stage a developer is able to make a presentation to the Planning Applications Committee; there is no requirement for a similar presentation to be made to ward councillors and/or the public. At planning committee meetings three people are allowed to address the committee for up to two minutes while a developer appears to have no such restriction and employs planning consultants and a supporting cast of expert witnesses to make their presentation and additional points, and answer queries from the developers' perspective.

Our experience of the local planning applications process for the Southwark Metals scrap yard application leads us to the conclusion that this is flawed. Sometimes developers hold local exhibitions for the public, and this is always welcome; we are uncertain if Lambeth planners seek to ensure this happens or what criteria they use in seeking to encourage or even require this. Often the first the community gets to hear of proposals is when the application is formally accepted and advertised.

In the case of Southwark Metals there were at least three amended and updated versions of the application submitted – resulting in the requirement of the community to review literally hundreds of documents usually within the stated 21 day consultation period. An enormous task even for paid professionals, let alone voluntary community groups.

Nevertheless the Southwark Metals application was refused, with reasons being finalised outside the meeting. The developer appealed and we still await the final decision which unusually is to be made by the Secretary of State and not the Planning Inspector. The appeal process actually enabled the community to address the Inspector for some hours and make its case far more effectively than was possible during the original consideration of the final application. This cannot be right. We accept that Lambeth planners are bound by legal and national processes, but hope you will provide benchmarking exemplars of other councils that have better public engagement processes in place.

When it comes to the SADPD, Site 18 is actually a jigsaw of small sites owned by different developers and the Council. Most have remained vacant and derelict and a blight on our town centre for decades. There have been piecemeal proposals but there seems to have been a

lack of ambition and assignment of the necessary resources by the Council in recent years to lead and bring developers together to achieve the provision of housing and other benefits the community so desperately needs. The Council also seems unwilling to use appropriately its compulsory purchase powers. There had been no public news on the site from the Council after the 2017 Master Plan was produced, until the December 2021 Cabinet decision.

We ask you to consider how the Council can embed a partnership approach with the community to development proposals and subsequent planning applications. This will inevitably mean going beyond any statutory requirements, but we believe this is the only viable and transparent way forward to rebuild the trust that has broken down, not least through the examples detailed above.

We understand that Lambeth is short of strategic planning, development control and enforcement staff. We suggest that recruitment and retention of adequate staffing resources is given consideration by your review.

The next stages

Whilst understanding the Council's wish to address as quickly as possible the deficit in its strategic delivery of affordable homes in Lambeth, there is a clear need for this to be done with full transparency and democratic oversight. We urge you to recommend the Leader of the Council and the Cabinet Member to go further than simply publishing your report and their response. We strongly recommend the addition in the process of a period for any further thoughts from the community to be offered and considered, and then for the necessary decisions to be taken to Cabinet for approval.

We hope these detailed thoughts, developed through our recent experiences, are useful in your deliberations. If we can be of any further assistance, please do not hesitate to contact us.

Regards
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